

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 23, 2016

Mr. Sumeet Singh, Vice President
Pacific Gas and Electric Company
Gas Asset and Risk Management
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

GI-2016-09-PGE21-01B

SUBJECT: General Order 112 Gas Inspection of PG&E's Rio Vista & Los Medanos Districts

Dear Mr. Singh:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112¹ inspection of Pacific Gas & Electric Company's (PG&E) Rio Vista and Los Medanos Districts (District) on September 19-23, 2016. The inspection included a review of the District's records for the period of 2013-2015, as well as a representative field sample of the Division's facilities in Rio Vista and Los Medanos. SED staff also reviewed the District's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations and observations noted in the Summary. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation found during the inspection.

If you have any questions, please contact Mohammad Ali at (916) 7928-2109 or at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

PG&E's Internal Audit Findings

Prior to the start of the audit, PG&E provided SED its findings from the internal review it conducted of Rio Vista District (District). Some of PG&E's internal review findings are violations of PG&E's standards, and are therefore violations of Title 49 Code of Federal Regulations (CFR), §192.13(c) or §192.605(a). SED is aware that PG&E corrected some of its findings prior to SED's inspection. Table 1 lists all of the violations from PG&E's internal review.

Table 1: PG&E's Internal Review

Code Section	# of Non-Compliances	Finding Description	Corrective Action	Remediation Date
192.605(a)	10	Reasons for partial operation of valves were not noted in "Action Plan" on the Gas Valve Maintenance Record in 2014 and 2015	District began noting the reason on 1/1/2016	12/1/2015
	60	TD-4430P-04-F01 & ...F02 were not used to record valve maintenance as required in 2014, 2015 and 2016	On 12/1/2016 Rio Vista District will begin using the AMBBS version of SAP to record maintenance data on all reliability and compliance valves.	09/15/2016
	1	Valve maintenance was not documented for V-10.74 in 2015	The employee retired. Electronic record on file (Binder 15, Tab 12).	03/17/2016
	4	Valve maintenance was not documented for V-241 on L-200 for 2013, 2014, and 2015	District changed the maintenance plan from reliability (B) to emergency (A) valve maintenance. A valve card was also created.	09/15/2016
	5	Missed calibration verification of Multi-Gas Monitors within the 45-Day window as required	All five units were calibrated on 8/25/2016. Refresher review of procedure was conducted on 9/1/2016	09/01/2016
	20	Missed calibration verification of Pipeline Locators within the 45-Day window as required	Calibration verification for all units was completed between 46 and 52 days. Refresher review of procedure was conducted on 9/1/2016	09/01/2016

II. Areas of Concern/ Observations/ Recommendations

1.
 - a. SED reviewed the Rio Vista Gas Valve Maintenance record at Rio Vista Y valve lot and identified Emergency Transmission Valve (L-200) # 0.00 designated as a Main Line Valve (MLV). However, during the field verification it was revealed that this valve was not an MLV, but instead a Tap Valve. The District responded that this was a typing error, and corrected the Valve Maintenance record.
 - b. Records of inspection for Valve # 0.00 (L-200) for 2013 and 2014 were not found on the Valve Maintenance record card. However, electronic copies of the inspections were provided.
2. During SED's field verification at Rio Wye Station, SED noted that Gas Transmission blowdown valve #K, which was connected to Valve #19, was found to be inactive.
3.
 - a. During SED's field verification at Serpa Station, SED noted that Transmission valves V-63 and 64 were both identified as valves for L-200. However, in the field it was observed that both lines had different operating pressure. The District realized that valve V-64 was on L-200 and V- 63 was on L-200A.
 - b. Records of inspections for valves V-63 and V-64 for 2013 and 2014 were not found on the Valve Maintenance records, however, electronic copies of the inspections were provided.
4. During SED's field verification at Station Charge 1 of Transmission line L-200, SED observed that the pressure recording device manufactured by Reynolds Equipment Company was not functioning. There were no pressure recordings on the chart.